# AgriSystems International™

**Headquarters:**
125 West Seventh Street
Wind Gap, Pennsylvania 18091 USA
Telephone: (610)863-6700
Facsimile: (610)863-4622
Email: agrisys1@aol.com

A Company of LVOG Inc.
A Global Partner

**Washington, D.C. Office:**
P.O. Box 7691
Arlington, VA 22207 USA
Telephone: (703)528-6550
Facsimile: (703)528-6551
Email: agrisysdc@aol.com


*AgriSystems International*
Presentation to the National Organic Standards Board
June 8, 1999

1. Certified Organic Wild Catch Fish, Seafood, and Sea Products
2. GMOs as Organic Food Processing Ingredients and Aids

## Certified Organic Wild Catch Fish, Seafood, and Sea Products

The arguments put forth by the National Organic Standards Board's Livestock Committee, while persuasive, ignore a fundamental principle of certified organic production – **the protection and nurturing of nature's ecosystems and biodiversity**. To promulgate organic standards for and certification of **monocropped** penned aquaculture systems over that of marine fishes and seafood (defined as invertebraes, including shellfish, crustaceans and cephalopods) and other sea products is irresponsible. This is particularly true when those systems do not utilize native species and escape into the wild is possible, causing bioinvasion of the ecosystem. These operations disrupt shoreline environments and contribute to effluent pollution, causing algae blooms and other serious problems for local wildlife. Also, monoculture systems tend toward a dependency on medicated feeds, flesh dyes, and sex reversal practices.

The Marine Stewardship Council venture between the Worldwide Fund for Nature and Unilever NV Plc, puts a conventional multinational corporation ahead of the organic industry in addressing the merits of certifying wild fish, seafood and sea products. Fishery practices around the world are seriously endangering global fish stocks as well as oceanic and riparian ecosystems and incidentally-caught endangered, threatened and protected animal species. At present, about a third of the marine life caught by fisheries is dumped back into the ocean dead or dying, including not only undersized and immature target catch, but other fish, seabirds, sea turtles, and marine mammals. This carnage amounts to some 27 million tons, according to the Food & Agriculture Organization.

The marketplace is powerful. Consumers are ever increasingly food label conscious. While the MSC logo will guide consumers toward environmentally responsible purchases, and the initiative is highly commendable, its mission is broad and dedicated to the sustenance and renewal of the commercial fishing industry. The MSC initiative is also concerned with local, national, and

international laws and treaties, and the economic viability of fishing communities. Its effort to bring the issue of wasteful by-catch practices to the forefront and to instill principles of biodiversity and ecosystem integrity are ground-setting. However, organic wild catch standards and certification can challenge fisheries to go a step further – to identify contaminant sources, to consider the feeding practices of the target species, and to more resolutely prohibit practices damaging or non-restorative of the marine ecosystem.

The strength of the organic label across global markets gives wild-caught fish and seafood the opportunity to grow its market share, rapidly encouraging further responsible fishery operations to become certified organic.

How can we ignore our responsibility to river, lake and ocean species and ecosystems? Retailers will perhaps merchandise "sustainable" fish products, but their promotion of these products along side fish and seafood not identified as such may be hesitant and slow. Already one large natural food supermarket chain has turned down the opportunity to promote "turtle-safe shrimp" – a product that has been certified to be from shrimping operations employing a device that releases sea turtles from shrimp nets. Every year, hundreds of thousands of these endangered creatures still die incidentally in shrimp catches.

If retailers were, however, offered the opportunity to stock seafood and fish with the organic label, for reasons of perceived price premium and consumer demand, we believe retailers would respond strongly to supply. As one more certified organic product category in a rapidly expanding and diversifying line of organic foods, organic wild fish and seafood faces eager markets. The opportunities in the food service sector also abound, as chefs across the United States commit to creating more organic food menu options.

Think of the power to influence sustainable and restorable fishery practices! To ignore this opportunity is irresponsible of the National Organic Standards Board.

We now approach the highly controversial issue of designing specific organic standards for wild-caught fish and seafood. While the NOSB Livestock Committee puts forth practical arguments against such standards, the obstacle of identification and monitoring can be overcome with one simple paradigm shift – **that these principles apply to the catch area**, which may be defined precisely through mapping and the testing of waters. By incorporating specific measures to protect incidental species and the oceanic or riparian ecosystem overall and to prevent over-fishing so that the natural functional relationships among species are maintained, organic standards for wild catch will fulfill the promise of the organic community to protect biodiversity and regenerate natural resources.

We address the feed issue by suggesting an analogy between the natural fertilization of wild-harvested echinacea and the feeding behaviors of fish in a natural marine ecosystem.

The organic standards should include restrictions on catch levels and fishing gear so that non-target species, including under-aged or under-sized versions of the target species, are not captured as a consequence of landing the target species. Destructive fishing practices, such as the use of poisons and explosives, must be prohibited.

Fishing methods that protect marine habitats, especially in spawning and nursery areas, can be defined and documented. The recovery and rebuilding of already depleted marine life populations can be required within specified time frames for both migratory and stationary species.

We suggest random, unannounced on-site inspections of fishing vessels and managed fishing vessels for compliance monitoring

Record-keeping becomes simply a matter of quantifying and qualifying each catch, and testing the waters and samples of catch for prohibited materials. The Wild Catch Farm Plan must include an ability to document the chain of custody, from managed fishing area and vessel to dock to wholesale market, distributor, or processor, to retailer or food service operation. In the MSC scheme, every link in the chain of custody is certified to prevent fraud, including retailers and restaurants.

On-board fishing vessel inspection and overall assessment of physical fishery operation can be conducted, as in land-based certified organic operations. The MSC has already accredited several certification organizations which also certify organic farms and livestock operations. These include: The Soil Association, Skal, and Naturland.

At the processing level, organic standards become replicable of organic meat handling standards – those which incorporate elements of Hazard Analysis Critical Control Points (HACCP) at all level instill responsibility to the consumer that can only enhance the value of the final organic product and safeguard the quality represented by the organic label.

Certifying organic wildcatch falls within the parameters of OFPA. Therefore, we advocate and are willing to assist in the development of organic wildcatch standards and certification guidelines. We support the initiative of the State of Alaska, and encourage them to include all wild species in their proposal to the NOSB.

# GMOs as Organic Food Processing Ingredients and Aids

The U.S. organic food processing industry, and subsequently the National Organic Standards Board (NOSB), is currently faced with a dilemma over the use – continued and expansive – of synthetic ingredients and processing aids. The attitude appears staunchly precedent-based – meaning without an enforceable national standard prohibiting their use under the U.S. Organic Foods Production Act – certifiers have allowed a select few. Most processors have a favorite.

We are not here, however, to argue the pros and cons of synthetics in foods labeled organic. But where genetically-modified organisms (GMOs) can slide into allowed materials lists under the guise of synthetics, we are concerned.

We do not have to tell this audience what market opportunities the world over have been created because consumers presume organics do not contain GMOs. And we don't need to paint a picture of the disastrous consequences for organic foods should they be tainted with GMOs. The case of U.S. GMO-contaminated organic corn chips discovered in Europe is a case in point.

A phase-out of GM enzymes, xanthum gum, and other additives and aids now rumored to be in certain organic foods would be deceptive – consumers believe organic foods are their last option in a sea of foods with soy, canola, corn and other agricultural product ingredients now potentially grown from GM seed. To even include GMOs as acceptable processing aids would alarm most consumers unfamiliar with just how processing works.

The industry – and those select companies reliant upon GM aids – cannot take the chance of removing this important distinction between organic and conventional – and even organic and natural – labels. It is selfish – and risky to the farmers and others committed to production without GMOs, and making some sacrifice to do so, at least theoretically-speaking.

The argument over GMOs arises over cost and availability of non-GMO alternatives. We encourage the industry – and particularly the NOSB, to the extent USDA can be tapped for resources – to develop databases of non-GMO sources, and while recommending against GMO sue from field to shelf, provide producers and processors with real choices of inputs, ingredients, and aids.

The window of opportunity will close without the proactive effort of the organic industry and NOSB. Without buyers, non-GMO sources will dry up. The effort to retain non-GMO sources of ingredients commonly found in organic manufactured foods – such as lecithin and cornstarch – as well as processing aids, such as enzymes – must be substantial. The NOSB must safeguard organic integrity into the future by motivating organic producers to seek out, patronize, and build these sources. Further, we need to encourage the establishment of an independent industry to supply organic food processors with non-GMO ingredients and aids, parallel to the crop input industry developing around the needs of certified organic producers.

Don't waste the grand opportunity the organic industry has to be the world's true food source. With every food scare – from Alar to Mad Cow to the recent dioxin case in Belgium – the market for organic foods is fueled. More mainstream supermarkets, at least in Europe, are committing to sourcing non-GMO ingredients for the private label lines, and the pressure on organic supplies is fortified. Many consumers fear GMOs, and their impact on the environment is risk-filled, at best. To ignore these realities, even in the single case exemption of a processing aid used to make a single type of organic food, is dangerous for the industry as a whole, and a disservice to the consumers and all others believing that organic means in harmony with nature.

We believe the NOSB must adopt a GMO-free system under the OFPA. Cross-pollination by GM crops must be regulated similarly to pesticide drift, with zero or very low tolerances established and random sampling measures taken. The biotechnology industry is quickly penetrating U.S. agriculture, cutting off options for organic producers in its wake. The Board's action on this issue must be swift and meaningful.

Thank you.